



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

November 19, 2012

Michael J. Erickson. P.E.
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Subject :Former Plainwell Impoundment and Plainwell No. 2 Dam Area Fall 2012 Bank Repair Plan Technical Memorandum - Revised November 2012 (Dated November 15, 2012)

Mr. Erickson:

The United States Environmental Protection Agency (U.S. EPA), in consultation with the Michigan Department . of Environmental Quality (MDEQ), has reviewed the subject document. The document describes the bank maintenance activities that will be implemented during the 2012 construction season.

The bank maintenance activities includes repair in four areas:

- 1) Former Plainwell impoundment Western Channel (including smaller areas of Removal Area 13B)
- 2) Former Plainwell Impoundment Removal Area 4A
- 3) Former Plainwell Impoundment Removal Area 6B
- 4) Plainwell No. 2 Dam Area Removal Area 3A.

U.S. EPA approves the proposed maintenance activities in the aforementioned areas.

However, we have the following concerns which must be discussed and addressed as you move forward with the bank repairs.

- a) Bank erosion in Removal Area 10A, Pipeline Crossing - In our previous letter on Oct. 15, 2012, we requested that this area be armored with rock to stop the erosion. We understand your concerns regarding the the safety issues involved in the placement of rock in the area of the pipeline crossing. The benefits of additional armoring in this area must be evaluated against the risk of damaging the pipeline.

The nature and extent of PCB waste in the sediment and bank has changed in the past two years. Therefore in order to provide better information to support a final decision, we recommend that the exposed waste and bank in this area be sampled and analyzed to

determine the level of PCBs present. We recommend that we meet to discuss the scope of the sampling plan as soon as possible.

- b) A small area of exposed liner was observed at RA 10B during the August 30, 2012 visit. The rock must be replaced to cover the exposed liner.
- c) Removal areas 7B, 8B and 9B, that have been previously armored with coir log and rock should be supplemented to ensure rock is present up to the bankfull elevation due to the unstable river channel. These areas, if not addressed under the TCRA must be addressed under the Record of Decision.
- d) In order to ensure that no other areas needing bank repair are overlooked, U.S. EPA and State are planning an inspection of the entire length of the Former Plainwell Impoundment Area by boat as soon as possible. We invite Arcadis and Georgia Pacific to join us. Dates are to be determined at this time.

If you have any questions regarding these comments, please contact me at (312) 886-4314.

Sincerely,

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